

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PROTECTIVE LIFE INSURANCE  
COMPANY,

Plaintiff,

v.

WELLS FARGO BANK, N.A., as securities  
intermediary,

Defendant.

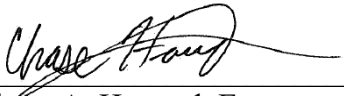
Misc. No. \_\_\_\_\_

D.D.C. Case No. 20-cv-2101

**PLAINTIFF’S MOTION TO COMPEL PRODUCTION BY THIRD-PARTIES  
PFP FUNDING I LLC, PFP FUNDING II LLC, CHC FINANCIAL LLC,  
COVENTRY FIRST LLC, AND COVENTRY CAPITAL I LLC**

Plaintiff Protective Life Insurance Company (“Protective Life”) respectfully moves this Court for an entry of an order under Fed. R. Civ. P. 45 compelling PFP Funding I LLC, PFP Funding II LLC, CHC Financial LLC, Coventry First LLC, and Coventry Capital I LLC (the “Coventry Entities”) to produce all responsive documents in accordance with the Subpoenas *Duces Tecum* served on the Coventry Entities by Protective Life (the “Subpoenas”) in a STOLI case pending in the United States District Court for the District of Columbia, *Protective Life Ins. Co. v. Wells Fargo Bank, N.A.*, Case No. 20-cv-2101 (the “D.C. Action”) (attached hereto as Exhibit A to the Declaration of Chase A. Howard). The grounds for this Motion are set forth more fully in the accompanying Memorandum of Law, Local Rule 26.1 Certification, and Declarations of Chase A. Howard and Douglas B. Fox in support thereof, which are incorporated by reference here in.

Dated: July 12, 2021

  
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